

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**LACI N. BLANCHARD, Individually,  
and as next friend of W.B., Surviving  
minor child of  
RONNIE P. BLANCHARD, JR.**

***Plaintiffs***

**Civil Action No. 4:22-cv-2420**

**v.**

**SANARE ENERGY PARTNERS LLC, et al**

***Defendants***

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**SBS ENERGY SERVICES, LLC'S DESIGNATION OF EXPERTS**

SBS Energy Services, LLC serves this Designation of Experts as notice that it intends to call the witnesses listed below at the time of trial to provide expert testimony in this case.

**I.  
Retained Experts**

*Badreddin Diab, PhD, PE*  
Offshore Mechanics, Inc.  
Ports & Terminals Americas, ABL  
10613 W. Sam Houston Parkway N., Suite 400  
Houston, TX 77064

Bader Diab, PhD, PE is a professional structural engineer with a background in design and assessment of mobile offshore units including drilling structures foundations and offshore installation with exposure to workover units. Bader Diab's opinions are based on his knowledge, education, experience, and the literature in his field of expertise and documents reviewed. He is expected to testify as stated in his report regarding the bogus claim that SBS had a duty to inspect Sanare's structure, and he will point the finger where it belongs – at Sanare, the operator charged by law with a duty to perform corrosion checks and maintain its own platform. He is expected to contradict the assertions of Joe Thompson, Scott Marshall and certain fact witness testimony, all as stated in his report. In light of Sanare's refusal to respond to discovery or produce certain witnesses to testify, he may supplement his report once the court resolves the discovery dispute and to the extent the court requires that Sanare comply with the repeated requests of SBS. Mr. Diab is expected to testify that the Sanare structure was

defective in design due to the difficulty of inspecting for corrosion, that Sanare abdicated its responsibilities to the federal government and all employees on the Main Pass 64 job by failing to do corrosion checks, that Sanare was grossly negligent to the extent it relied upon SBS, a contractor with no structural engineering expertise, to tell them what structural integrity determinations should be made, when the law imposes that obligation solely and exclusively on Sanare.

*Charles C. Overstreet, PE*  
Omicron Project Consulting  
1718 Bailey Street  
Houston, TX 77019

As an SME, Charles Overstreet, P.E., is a University of Texas Mechanical Engineer with over 30 years of oilfield experience, mostly in the pressure control sector. He has been the owner of his own business and VP Engr. in M2ES since 2017. His vast knowledge in Drilling, Snubbing, P&A, Well Control, Coiled Tubing, and structural and tool designs for land, offshore, and subsea applications placed him in the capacity of Lead Project Engineer within a leading service company. In that key capacity, he provided engineering support to the pressure control service lines ranging from supervising project manager to job modeling to field engineer for complex projects. He was involved in the development of company engineering policy as well as development and training of the company's junior engineers and has presented numerous technical seminars to the company's customer base.

With his technical experience, he has registered five (5) US Patents and one Pat. Pend. including two primary inventor patents that are directly related to Snubbing and Sub-Sea applications and understands the patent process and requirements. He is an active member of the Society of Petroleum Engineers (SPE), AADE, IADC (past) and has served as a member of API 16C – WIWC subcommittee, API 5C7 committee and director position of ICoTA.

Achievements involved co-authoring several well intervention articles in industry publications such as World Oil and Hart's E&P as well as multiple SPE publications: Mr. Overstreet has received industry recognition including Offshore Technology Conference's (OTC) 2002 Hart's E&P Special Meritorious Award for Engineering Innovation – Hydraulic Rack Jack Drilling System and OTC's 2006 Finalist in ASME IPTI – Woelfel Best Mechanical Engineering Achievement Award – Subsea Hot Tap System.

Experience includes business development, project estimating and proposal development, scheduling, administration, and oilfield mechanical engineering.

At trial, he will testify as stated in his report – that all roads lead to Sanare, that the accident was not substantially certain to occur from the perspective of SBS, but it was from the perspective of Sanare, which had complete and exclusive control of the MP64#19 structure, and had a responsibility under federal law to perform corrosion checks and take certain steps prior to allowing a workover rig to be installed. SBS was

reasonable in expecting that Sanare had complied with its obligations and had no responsibility for conducting structural integrity checks. To the extent Sanare assumed that SBS would make structural integrity determinations, this was gross negligence and an abdication of its own responsibilities. Mr. Overstreet, like the fact witnesses, that in his over 30 years of experience in the snubbing industry it is always the operator, and never the snubbing company, to make structural integrity determinations, and it is the operator, not the snubbing company, who decides if alternate methods should be used. Mr. Overstreet will also contradict the lately contrived and bogus contention that a work vest and quick release harness had anything to do with the accident. He will also address wind speed contentions and the rigup itself. He will identify the true cause of the accident – the corrosion that led to the death of Mr. Blanchard, and the road that leads directly to the true culprit – Sanare.

*Keith W. Van Meter, MD*  
2000 Canal Street, Suite 2720  
New Orleans, LA 70112

Dr. Keith W. Van Meter is board-certified in Emergency Medicine, Undersea and Hyperbaric Medicine, Pediatric Emergency Medicine, and Medical Toxicology and his current title is Chief, LSU Section of Emergency Medicine. He will testify consistent with his report, that Mr. Blanchard suffered only a brief moment of fright and consciousness before his death because he was knocked unconscious before he fell into the water and subsequently drowned.

*Kenneth J. Boudreaux, PhD*  
Dan M. Cliffe  
John R. Page  
1424 Bordeaux Street  
New Orleans, LA 70115

Dr. Kenneth Boudreaux, Dan Cliffe, and John Page are consulting economists. They have extensive education and experience in evaluating economic loss. Dr. Boudreaux is expected to be the witness at trial, with Dan Cliffe and John Page as alternates. He will testify consistent with his report regarding the valuation of Laci Blanchard's economic loss claim.

## II. **Non– Retained Experts**

The following physician and medical facility have knowledge of Mr. Blanchard's injuries which caused his death and may be called up to give expert testimony. In lieu of trial testimony, Dr. Troxclair's deposition has been set. The facility has performed an autopsy on Mr. Blanchard. As such, she possesses expertise

and knowledge in her respective areas of practice.

Dr. Dana Troxclair  
Jefferson Parish Forensic Center  
2018 8<sup>th</sup> St.  
Harvey, LA 70058

Stephen Harris, Bureau of Safety and Environmental Enforcement, Office of Incident Investigations, Office: 504.736.324, investigated the accident, determined its causes, and identified the responsibilities of the parties involved in the job. He may have qualifications as an expert in accident investigation and reconstruction, as well as regulatory expertise and industry practices, and he may be called to testify on such matters.

### **III.** **Other Experts**

There may be other individuals who are designated as experts by other parties, all of whom SBS Energy Services, LLC reserves the right to call as expert witnesses. By making this cross– designation, SBS Energy Services, LLC does not waive the right to challenge the ability of the other parties’ experts to testify in this case.

### **IV.** **Rebuttal Experts**

SBS Energy Services, LLC reserves the right to designate and call rebuttal expert witnesses, the identity of which cannot reasonably be anticipated at this time. SBS Energy Services, LLC reserves the right to challenge the testimony and qualifications of any expert designated by other parties. SBS Energy Services, LLC reserves the right to supplement this disclosure.

Respectfully submitted:

LeBAS LAW OFFICES,  
(A Professional Law Corporation)

*/s/ Henry H. LeBas*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing pleading has this day been forwarded to all known counsel of record via email transmission.

New Orleans, Louisiana this 17<sup>th</sup> day of June 2025.

*/s/Henry H. LeBas*

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HENRY H. LeBAS